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July 15, 2021

**VIA OVERNIGHT COURIER,
PASSWORD-PROTECTED EMAIL
FROM WILLETTE.HILL@BBKLAW.COM,
AND ECFS**

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
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Re: VRS Certification Application, and Request for Confidential Treatment Pursuant to
47 C.F.R. §§ 0.457 and 0.459; *Telecommunications Relay Service and Speech-to-
Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket
No. 03-123

Dear Ms. Dortch:

Tive, LLC (“Tive”) hereby submits the enclosed application (“Tive Application”) for certification as a provider of video relay service (“VRS”), and respectfully requests, pursuant to Sections 0.457 and 0.459 of the rules of the Federal Communications Commissions (“Commission”), confidential treatment of certain information contained in the Tive Application. The Tive Application updates and replaces Tive’s initial application for certification as a provider of VRS which was submitted to the Commission on July 2, 2021. The July 2 application should be considered withdrawn.

In accordance with the requirements of Section 0.459(b), Tive submits the following:

1. 0.459(b)(1): Identification of the specific information for which confidential treatment is sought: Tive requests that the redacted portions of the public version of the Tive Application, including all exhibits (collectively, the “Redacted Materials”), be treated as confidential and withheld from public inspection. The Redacted Materials contain highly sensitive commercial information, trade secrets, and proprietary technical information pertaining to the services offered by Tive. Pursuant to the Freedom of Information Act (“FOIA”), public disclosure is not

required for documents that are “trade secrets, commercial or financial information obtained from a person and privileged and confidential.” For this reason, the Redacted Materials are covered by the FOIA exceptions.

2. 0.459(b)(2): Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission: The Tive Application is being submitted to the Commission in CG Docket No. 03-123 pursuant to 47 C.F.R. § 64.606(a)(2).
3. 0.459(b)(3): Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged: The Redacted Information contains sensitive information about Tive’s internal operations, as well as commercial, financial and other trade secrets. Pursuant to the FOIA, public disclosure of such information is not required if it contains “commercial or financial information obtained from a person and [is] privileged and confidential.” 5 U.S.C. § 552(b)(4) (“Exemption 4”). Such information “would customarily be guarded from competitors.” 47 C.F.R. § 0.457(d)(2). For this reason, Tive submits that the information contained in the Tive Application is covered by the FOIA exception. The United States Supreme Court has held that Exemption 4 covers any material that is customarily treated as confidential and is in fact treated as confidential by the submitting party, irrespective of whether release would give rise to competitive harm. *Food Marketing Inst. v. Argus Leader Media*, 139 S. Ct. 2356, 2366 (2019). The information in this filing is customarily treated as confidential and is in fact treated as confidential by Tive, and thus should be covered by Exemption 4.
4. 0.459(b)(4): Explanation of the degree to which the information concerns a service that is subject to competition: The VRS market is highly competitive throughout the United States, and the documents produced in this filing relate entity to that market.
5. 0.459(b)(5): Explanation of how disclosure of the information could result in substantial competitive harm: Substantial competitive injury would result from the disclosure of the Redacted Materials, by providing Tive’s competitors with ready access to confidential information about Tive’s internal processes and strategic efforts. Tive has expended considerable funds and resources for the development of its VRS offering, which would be compromised through public disclosure.
6. 0.459(b)(6): Identification of any measures taken by the submitting party to prevent unauthorized disclosure: Tive requires that its employees treat the Redacted Materials as confidential and privileged. In keeping with this practice, Tive has requested confidential treatment of the Redacted Materials by the Commission.
7. 0.459(b)(7): Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties: Tive does not make confidential information such as that in the Tive Updated Application available to the public, and the Redacted Materials have not been previously disclosed to third parties.

8. 0.459(b)(8): Justification of the period during which the submitting party asserts that material should not be available for public disclosure: Tive requests that the Commission withhold the Redacted Materials indefinitely. As long as the VRS industry remains competitive, the public interest will be served if the Commission maintains the confidentiality of the Redacted Materials, in order to foster an environment in which regulated entities may submit sensitive materials for agency review without risking public disclosure and thus competitive harm.

Should you have any questions or need additional information, please contact the undersigned.

Sincerely,



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Counsel for Tive, LLC

Enc.

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
Telecommunications Relay Services and) CG Docket No. 03-123
Speech-to-Speech Services for Individuals)
With Hearing and Speech Disabilities)

To: Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program

**APPLICATION OF TIVE, LLC, DBA TIVE, FOR FULL CERTIFICATION TO
PROVIDE VIDEO RELAY SERVICE**

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I. INTRODUCTION AND SUMMARY

Tive, LLC (“Tive”), pursuant to Section 64.606(a)(2) of the Federal Communications Commission’s (“Commission” or “FCC”) rules, hereby submits its application to the Commission for certification as a provider of Video Relay Service (“VRS”) eligible for compensation from the Interstate Telecommunications Relay Service Fund (“TRS Fund”) on a non-conditional basis.

Tive™ is a privately-owned, California limited liability company with its permanent headquarters located at 137 N. Larchmont Blvd., #626, Los Angeles, California 90004. Tive provides a free downloadable software application for mobile devices designed to meet the needs of individuals who are Deaf or Hard-of-Hearing (“HOH”) by providing a range of functionality and resources. The Tive application is an adaptable communications and community platform designed for all who navigate the world through ASL that is designed to empower 37.5 million Deaf and HOH Americans¹ whose lives will be enhanced by real-time, on-demand American Sign Language (“ASL”) interpretation services and community resources.

The Tive mobile application facilitates untethered access for individuals who have long been underserved by communication technology innovation. Curated and designed specifically to be welcoming, the Tive mobile application is content-rich and offers an environment to enable and empower the lives of Deaf and HOH Americans and their families. As such, the Tive mobile application provides the very capabilities for which Congress found TRS necessary: to “bridge the gap between the communications-impaired telephone user and the community at large”.² Tive is committed to working closely with the Deaf and HOH community to ensure that its real-time and reliable communications services continue to meet their needs as it will demonstrate below.

II. DESCRIPTION OF THE FORMS OF TRS TO BE PROVIDED (47 C.F.R. § 64.606(a)(2)(i))

Tive is seeking to provide TRS Fund-eligible VRS. Tive will provide VRS via its downloadable software application for mobile phones and tablets accessible via the IOS App Store and Google Play. Tive’s free VRS software application (“Tive VRS”) enables users to easily access: Tive’s skilled communications assistants (“CAs”) to complete VRS calls; Registered internet-based TRS users’³ own account information through secure password protected access; and Tive’s customer care representatives.

¹ Blackwell DL, Lucas JW, Clarke TC, Summary health statistics for U.S. adults: National Health Interview Survey, 2012, National Center for Health Statistics, Vital Health Stat 10(260). 2014.

² H.R. Rep. No. 485, Pt. 2, 101st Cong., 2d Sess. at 129 (1990) (House Report).

³ 47 C.F.R. § 9.3 (“An individual that has registered with a VRS, IP Relay, or IP CTS provider as described in § 64.611”) (“Registered User”).

III. DETAILED DESCRIPTION OF HOW THE PROVIDER WILL MEET ALL NON-WAIVED MANDATORY MINIMUM STANDARDS (47 C.F.R. § 64.606(a)(2)(ii))

Tive meets all non-waived VRS mandatory minimum standards as set forth in Section 64.604 of the Commission's rules and other applicable regulations, as detailed below. Tive's compliance will be detailed further through its compliance plan and compliance and operations manual to be presented to the Commission.

A. Operational Standards - 47 C.F.R. § 64.604(a)

1. Communications Assistants - 47 C.F.R. § 64.604(a)(1)

a. CA Training - 47 C.F.R. § 64.604(a)(1)(i)

Tive has developed an intensive in-house training program in which its CAs are sufficiently instructed on how to effectively meet the specialized communications needs of individuals with hearing and speech disabilities. Newly hired CAs are trained on subjects including basic information about Tive, VRS history, regulatory requirements including, but not limited to, speed of answer, minimum call interpretation time, emergency calling procedures, and an overview of Tive VRS technology, compliance processes, and data confidentiality, among other topics, prior to being assigned to interpret calls. Following classroom instruction, all new CAs receive extensive hands-on training under an approved training syllabus, provided by a Tive trainer. Only when a trainer has determined that the CA is ready to interpret live calls will the CA be allowed to begin interpreting calls. Even then, the CA under the initial supervision of an experienced supervisor or senior interpreter for a 90-day probationary period.

b. CA Skills - 47 C.F.R. § 64.604(a)(1)(ii)

As part of its intensive training program, Tive ensures that its CAs handling VRS calls: are sufficiently skilled in ASL; have familiarity with hearing and speech disability, cultures, languages and etiquette; have diversity, equity and inclusion training; and possess clear and articulate voice communications skills.⁴ During the required 90-day probationary period, the CA is evaluated in three areas: technical skill, overall professional demeanor, and quality of service to users. If necessary, extended probation will be given to the CA until they are completely proficient in all three evaluated areas.

c. VRS CA Qualifications - 47 C.F.R. § 64.604(a)(1)(iv)

Through its applicant screening and in-house training systems, Tive ensures that all of its CAs are qualified interpreters and that they are able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. All

⁴ The minimum standards involving typing and spelling do not apply to VRS. *Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd. 5140, 5159 ¶ 42 (2000).

CAs are subject to periodic and field-tested evaluations and quality assurance reviews by Deaf, HOH, and hearing supervisors to verify skills and approach. Personality screening is also performed on supervisors to better understand and match management styles needed to maintain a productive work environment, enhancing CA interaction with Deaf and HOH users. Further, Tive requests user feedback regarding the CAs' demeanor and skill.

d. Ten Minute Rule - 47 C.F.R. § 64.604(a)(1)(v)

Tive's procedures provide that CAs must stay with any given call for a minimum of ten minutes once the CA reaches the called party before transferring the call to another CA, with termination (or transfer, if applicable) occurring upon the earlier of (a) the termination of the call by one of the parties or (b) the completion of the minimum time period. Initial training and regular updates on Commission rules are provided to CAs on a schedule and an *ad hoc* basis as needed.

e. Gender Preference - 47 C.F.R. § 64.604(a)(1)(vi)

As part of its operating procedures, Tive makes its best efforts to accommodate its users' requests regarding the gender of the CA handling their calls – both at call initiation and in the event of transfer to another CA.

2. Confidentiality and Conversation Content - 47 C.F.R. § 64.604(a)(2)

a. Confidentiality Rule - 47 C.F.R. § 64.604(a)(2)(i)

Tive bars its CAs from disclosing the content of any relayed conversation, except as authorized by 47 U.S.C. § 605, and from keeping records of the content of any conversation beyond the duration of the call. Technically, all VRS streams are encrypted because the streaming platform that Tive uses has built-in encryption protocols, and Tive has also enabled Advanced Encryption Standard ("AES") security on its video streams. Video streams are encrypted/decrypted on the client device, providing end-to-end security, confidentiality and protection against unauthorized access and eavesdropping, and integrity against tampering and forgery. Section IV below provides additional information about the video stream component of Tive's solution.

b. Accuracy Rule - 47 C.F.R. § 64.604(a)(2)(ii)

Tive bars its CAs from intentionally altering the conversations they relay, except to the extent (a) the VRS user requests summarization or similar alterations or (b) the user requests interpretation on a VRS call. Tive engages in periodic spot check monitoring of CA calls by supervisors or senior CAs to verify compliance.

3. Types of Calls - 47 C.F.R. § 64.604(a)(3)

a. Single or Sequential Calls & Call Length - 47 C.F.R. § 64.604(a)(3)(i)

Tive bars its CAs from refusing single or sequential calls and does not limit the length of calls.

b. Call Handling Capability & Credit Card Authorization - 47 C.F.R. § 64.604(a)(3)(ii)-(iii)

Tive VRS is capable of handling any type of call normally provided by telecommunications carriers except as exempted by the Commission. Because Tive does not assess charges for long-distance calling, Tive is not required to and does not provide billing options such as sent-paid long distance and operator-assisted, collect, and third party billing, nor does it permit users to place calls using calling cards or credit cards.⁵

c. VCO and HCO - 47 C.F.R. § 64.604(a)(3)(v)

Tive provides two-line voice carry-over (“VCO”) and two-line hearing carry-over (“HCO”) for all VRS users. Tive supports one-line VCO and one-line HCO by providing at least one form of TRS access technology that supports each functionality.

d. Speed Dialing - 47 C.F.R. § 64.604(a)(3)(vi)(B)

Tive makes speed-dialing functionality available to its VRS users. Users of Tive VRS are able to access their application address book and select added/saved contacts. The user then has the option of selecting a contact in their address book or manually adding a telephone number into the automatic call distribution platform to make an outbound call that will connect to a CA. Under either scenario, the user’s desired telephone number will then auto populate the CAs outbound call screen. The CA can simply connect the call without having to ask what number the caller has dialed.

e. Three-Way Calling - 47 C.F.R. § 64.604(a)(3)(vi)(C)

Tive provides three-way calling capabilities for all of its VRS users. At the instruction of the inbound caller, Tive VRS can connect up to two additional parties to any call (audio or video) and perform a three-way call.

4. Voice Mail and Interactive Menus - 47 C.F.R. § 64.604(a)(3)(vii)

If voice mail or interactive menus are encountered when the called party is reached, Tive’s CAs notify a user to the presence of the voice mail or interactive menu and processes such

⁵ *Telecommunications Relay Services & Speech-to-Speech Services for Individuals with Hearing & Speech Disabilities Waivers of ITRS Mandatory Minimum Standards*, Report and Order, Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, FCC 14-125 ¶¶ 11-15 (2014).

calls like any other call. Tive does not charge for additional calls to complete these types of calls.⁶

5. Answering Machine and Voice Mail – 47 C.F.R. § 64.604(a)(3)(viii)

Tive provides answering machine and voice mail retrieval to all users. Answering machine and voice mail is automatically available by default but users have the option to disable these using the simplified settings in the application.

6. Visual Privacy Screens/Idle Calls - 47 C.F.R. § 64.604(a)(6)

Tive VRS' call management system does not allow CAs to use privacy screens. Tive's CAs are required to disconnect a VRS call if either the calling or called party employs a privacy screen or similar feature for more than five minutes or is otherwise unresponsive for more than five minutes, except in the case of a 911 call or in circumstances in which the calling or called party has legitimately been placed on hold. Tive's CAs disconnect calls in these circumstances only after announcing the upcoming disconnection.

7. International Calls -- 47 C.F.R. § 64.604(a)(7)

Tive does not seek compensation for VRS calls that originate from an international IP address, with the exception of calls made by a U.S. resident who has pre-registered with Tive prior to leaving the country, as required under the Commission's rules. Registered Users are informed of the requirements associated with placing VRS calls using Tive VRS when traveling outside of the U.S. when contacting a Customer Care representative or a CA. Registered Users must pre-register for international calling by completing a *Permission to Travel-Call/ Extension Form* no less than two days prior to travel with Tive Customer Care. The international travel request asks the Registered User to indicate the dates of travel and reason for making the request. Requests are limited to a three-week period. Upon receipt of the *Permission to Travel-Call Form*, Customer Care verifies that the Registered User is a U.S. resident. No *Permission to Travel-Call Form* is approved unless fully completed and verified by Tive.

⁶ The requirement that the CA use a "hot key" to "send text from the CA to the consumer's TTY" plainly does not apply to VRS, which does not use TTYs or send text. 47 C.F.R. § 64.604(a)(3)(vii). Similarly, the requirement that TRS providers "electronically capture" recorded messages so that they can type the whole message without requiring the user to hang up and call back multiple times also plainly does not apply to VRS. Tive's CAs relay recorded messages in real time without requiring users to hang up and call back and therefore do not need to record electronic messages. *Telecommunications Relay Services and Speech-to-Speech Services for Individuals With Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd. 5140, 5179 ¶ 92 (2000) (noting that the recording requirement was imposed because without it, users were "unable to make calls that encounter interactive menus or other recorded messages or must frequently place a succession of calls to leave a message with, or access the information provided by, such systems").

B. Technical Standards - 47 C.F.R. § 64.604(b)

1. Speed of Answer-- 47 C.F.R. § 64.604(b)(2)(iii)

Tive complies with and exceeds the current speed-of-answer requirement that 80% of all calls are answered within 120 seconds measured on a monthly basis. Tive will submit speed of answer statistics in its monthly filing with the TRS Fund Administrator that demonstrates ongoing compliance. The automatic call distribution platform for Tive VRS uses an automated monitoring system that continually measures speed of answer with regular reports provided to Tive.

2. Equal Access to Interexchange Carriers -- 47 C.F.R. § 64.604(b)(3)

Equal access to interexchange requirements has been waived for VRS providers, so long as they do not charge for long distance calls.⁷ Tive does not charge users for long distance service or placing VRS calls.

3. TRS Facilities - 47 C.F.R. § 64.604(b)(4)

a. 24/7 Operations - 47 C.F.R. § 64.604(b)(4)(i)

Tive VRS is available 24 hours per day, seven days per week. Tive's managers are on-call 24 hours a day, seven days a week to ensure services remain operational.

b. Redundancy and Backup Power - 47 C.F.R. § 64.604(b)(4)(ii)

Tive VRS relies on equipment, system, and facility redundancy to ensure continual operation. Tive ensures that its CAs have a primary and secondary mechanism to charge their devices used for VRS calls and Tive VRS uses a secure enterprise cloud platform, described below in Section IV, resource locations to ensure high availability and redundancy of native application functions.

c. At-Home Interpreting - 47 C.F.R. § 64.604(b)(4)(iii)

Tive will only permit its CAs to handle VRS calls from a home work station pursuant to authorization by the Commission.

⁷ *Telecommunications Relay Services And Speech to Speech Services for Individuals with Hearing and Speech Disabilities; Waivers of Mandatory Minimum Standards*, Report and Order, Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, 29 FCC Rcd. 10697, 10703-04; 10705 (2014).

d. Automatic Call Distribution Platform - 47 C.F.R. § 64.604(b)(4)(iv)

Tive's automatic software as a service ("SaaS") call distribution platform is supported by experienced technical staff that is knowledgeable about the platform and its operations and has the capability of ensuring that the platform remains fully operational at all times.

4. Caller ID - 47 C.F.R. § 64.604(b)(6)

Tive VRS transmits Caller ID on all calls. This is accomplished by transmitting the user's assigned ten-digit number when placing an outbound call. In the rare instance in which a user enables the ability to block Caller ID on other provider technology, Tive's automatic SaaS call distribution platform can still successfully negotiate the call signaling and capture the corresponding ten-digit number and required information for reporting, even though the Caller ID will appear as anonymous to the outbound caller.

5. At-Home VRS Call Handling - 47 C.F.R. § 64.604(b)(8)

a. Personal Safeguard – 47 C.F.R. § 64.604(b)(8)(ii)

Tive allows a CA to work at home only if the CA: (1) is a qualified interpreter with at least three years of professional interpreting experience; (2) has the experience, knowledge, and skills necessary to effectively interpret VRS calls without in-person supervision; (3) has learned Tive's protocols for at home call handling; (4) understands and follows the TRS mandatory minimum standards; and (5) provides at-home support equivalent to that provided by CAs working from call centers. Tive ensures that each at home workstation enables the provision of confidential and uninterrupted service to the same extent as would the Tive's call centers and is seamlessly integrated into Tive's call routing, distribution, tracking and support systems.

b. Technical and Environmental Safeguards – 47 C.F.R. § 64.604(b)(8)(iii)

Tive ensures each home work station is: (1) in a separate, secure workspace where access during working hours is restricted solely to CA; (2) able to allow a CA to use all call-handling technology to the same extent as would call-center CAs; (3) capable of supporting VRS in compliance with the applicable mandatory minimum standards to the same degree as call centers; (4) equipped with an effective means to prevent eavesdropping and outside interruptions; and (5) connected to Tive's network over a secure connection to ensure caller privacy before activation the workstation for use.

c. Monitoring and Oversight Obligations; Monthly Reports – 47 C.F.R. § 64.604(b)(8)(iv)-(vi)

Tive: (1) inspects each home workstation and its home environment to confirm their compliance with 47 C.F.R. § 64.604(b)(8)(iii) before activating the work station for use; (2) assigns a unique work station identification number to each VRS home workstation; (3) equips each home workstation with monitoring technology sufficient to ensure that off-site supervision approximates the level of supervision as would exist at a call center; (4) regularly analyzes the

records and produced by such monitoring; (5) keeps all acceptable records pertaining to home workstations for at least five years; and (6) conducts random and unannounced inspections for at least five percent of all home workstations in each 12-month period. Tive will also comply with monthly and annual reporting requirements.

C. Functional Standards - 47 C.F.R. § 64.604(c)

1. Complaint Logs - 47 C.F.R. § 64.604(c)(1)

Tive will maintain logs of all complaints it receives that allege violations of the TRS mandatory minimum standards. The logs will include the date the complaint was filed, the nature of the complaint, the date of resolution, and the nature of resolution. Tive has further instituted a senior management review of all complaints to understand the basis for the complaint, to ensure that the complaint has been adequately resolved and to evaluate whether system amendments or improvements are needed. Tive will submit to the Commission a report of the number of complaints received annually on or before July 1 of each year.

2. Contact Person - 47 C.F.R. § 64.604(c)(2)

Tive's contact person to coordinate with the Commissions, its designees and the TRS Fund Administrator is:

Leif Martinoff
CEO
Tive, LLC
137 N. Larchmont Blvd., #626
Los Angeles, California 90004
Tel: 310-895-0730
leif@tivetechology.com

3. Public Access to Information and Consumer Outreach - 47 C.F.R. § 64.604(c)(3)

Tive publicizes the availability of VRS through print promotional materials, web-based promotional materials, sponsorship arrangements, and various virtual and in-person substantial community outreach initiatives. Tive communicates with its stakeholders through direct contact in community interpreting environments, and through private and governmental agencies that support the Deaf and HOH communities. Also, TiveMix^{TM8} and TiveHub^{TM9} provide trusted social connection, diverse engagement opportunities, and access to a robust range of free content, tools, resources, and feature-set curated specifically for the community allowing a wide range of

⁸ Tive offers a unique, content-rich, dynamic community, constantly evolving and improving – based on feedback and insight from our community members called TiveMix, not by an algorithm-blinded developers experience.

⁹ The Tive application represents differentiating technology, an unparalleled curated content environment, and an energetic and diverse platform for the Deaf/HOH users that reflects today's modern, multicultural America that we call TiveHub.

information at the fingertips of every user. Tive does not include the cost of these activities in its yearly cost submissions.

4. Rates - 47 C.F.R. § 64.604(c)(4)

Tive does not charge to place VRS calls. Tive is compliant with the Commission's rule prohibiting relay service providers from charging rates that are any greater than rates paid for functionally equivalent voice communications services with respect to the duration of the call, the time of day, and the distance from the point of origination and point of termination, accordingly.

5. Jurisdictional Separation of Costs - 47 C.F.R. § 64.604(c)(5)

a. Data Collection and Audits - 47 C.F.R. § 64.604(c)(5)(iii)(D)(1)

Tive will provide true and adequate data and other historical, projected and rate-related information requested by the TRS Fund Administrator necessary to determine TRS Fund revenue requirements, subject to TRS Fund Administrator audits.

b. Call Data - 47 C.F.R § 64.604(c)(5)(iii)(D)(2)-(5)

Tive's automatic SaaS call distribution platform automatically generates call detail records including all required data. These data are formatted by use of scripts according to the TRS Fund Administrator's detailed guidelines TRS Fund Monthly Filing Instructions. Scripts are automated and cannot be manipulated. Required monthly reports are compiled, reviewed, approved and then will be uploaded into the TRS Fund Administrator's online "extranet" portal. Current monthly reporting includes:

1. The call record ID sequence;
2. CA ID number;
3. Session start and end times noted at a minimum to the nearest second;
4. Conversation start and end times noted at a minimum to the nearest second;
5. Incoming telephone number and IP address (if call originates with an IP-based device) at the time of the call;
6. Outbound telephone number (if call terminates to a telephone) and IP address (if call terminates to an IP-based device) at the time of call;
7. Total conversation minutes;
8. Total session minutes;
9. The call center (by assigned center ID number) that handled the call; and
10. The speed of answer compliance data.

All reports are reviewed by Tive's senior engineer and production manager on a daily basis using DAR-Daily Activity Report, and also on a monthly basis using company MVR-Monthly Verification Report where all data is audited. Once data auditing is completed, the

submissions are certified by Tive's Chief Operations Officer who has first-hand knowledge of the data and its accuracy. All call detail records and speed of answer data are retained for a minimum of five years and are available for review by the Commission, the TRS Fund Administrator, and their designees.

c. Audits – 47 C.F.R. § 64.604(c)(5)(iii)(D)(6)

Tive will submit to audits annually and at times determined appropriate by the Commission, the TRS Fund Administrator, or an entity approved by the Commission for such purpose.

d. Call Data Retention – 47 C.F.R. § 64.604(c)(5)(iii)(D)(7)

Tive retains all supporting documentation for a minimum of five years in secure, password-protected servers with backup copies that are available to the Commission and the TRS Fund Administrator upon request. Tive has an established data retention policy that clearly delineates data retention requirements.

e. Information Filed – 47 C.F.R. § 64.604(c)(5)(iii)(I)

Tive's senior executive will certify under penalty of perjury that conversation minutes submitted to the TRS Fund for reimbursement are accurate in compliance with Section 225 of the Communications Act of 1996, as amended, and Commission rules, including user registration rules and rules that prohibit financial incentives or calls intended to generate usage.

f. Whistleblower Notice -- 47 C.F.R. § 64.604(c)(5)(iii)(M)

Tive has an established Whistleblower Policy incorporated into its Operations Manual. This policy encourages immediate reporting of any non-compliant activity directly to the Commission and senior management. Tive's Whistleblower Policy includes an accurate and complete description of the protections established by the Commission.¹⁰

g. Contracting -- 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(iii), (iv), and (v)

Tive does not contract with, or otherwise authorize any third party to provide interpretation services or call center functions. To the extent Tive subcontracts with a third party to provide services or functions related to VRS, upon certification, Tive will be clearly identified as the eligible VRS provider to the public and it is Tive's policy to execute these contracts in writing. Copies of all such contracts are available to the FCC and the TRS Fund Administrator upon request.

¹⁰ *Structure and Practices of the Video Relay Services Program*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 5545 (2011).

h. Call Center Reports – 47 C.F.R. § 64.604(c)(5)(iii)(N)(2)

Tive will file a written report with the Commission and TRS Fund Administrator annually on April 1st and October 1st for each call center that handles VRS calls that Tive owns or controls, which will include:

1. The complete street address of the center;
2. The number of individual CAs and CA managers; and
3. The name and contact information (phone number and e-mail address) of the manager(s) at the center.

Tive will also file written notification with the Commission and the TRS Fund Administrator of any change in a center's location, including the opening, closing, or relocation of any center, at least 30 days prior to any such change.

i. Compensation – 47 C.F.R. § 64.604(c)(5)(iii)(N)(3)

Tive's CAs are compensated in accordance with each CA's experience, work history, shift, and the time available to interpret calls. Under no circumstance is compensation, preference in work schedule, or any other benefit provided to a CA based upon the number of VRS minutes or calls that the CA handles, either individually or as part of a group.

j. Remote Training Calls – 47 C.F.R. § 64.604(c)(5)(iii)(N)(4)

Tive acknowledges that it is not entitled to compensation for VRS calls to remote training sessions or comparable activities when it (or its affiliates or related parties) has been involved in any manner with the session or activity.

6. Confidential Treatment of TRS Customer Information – 47 C.F.R. § 64.604(c)(7)

Tive does not use its users' profile data for any purpose other than to connect the VRS user with the called parties desired by that VRS user. Neither Tive nor its employees sell, distribute, share, or reveal the profile data unless compelled by law to do so.

7. Incentives for Use of VRS - 47 C.F.R. § 64.604(c)(8)(v)

Tive does not offer or provide to any person or entity any form of direct or indirect incentives, financial or otherwise, for the purpose of encouraging individuals to register for or use Tive's VRS.

8. Discrimination and Preferences – 47 C.F.R. § 64.604(c)(12)

Tive does not discriminate directly or indirectly, by any means or device, or engage in any unjust or unreasonable discrimination related to practices, facilities, or services for or in connection with its provision of VRS, engage in or give any undue or unreasonable preference or

advantage to any particular person, class of persons, or locality, or subject any particular person, class of persons, or locality to any undue or unreasonable prejudice or disadvantage.

9. Unauthorized and Unnecessary Use of VRS – 47 C.F.R. § 64.604(c)(13)

Tive does not engage in any practice that will cause or encourage: (a) false or unverified claims for TRS Fund compensation; (b) unauthorized use of VRS; (c) the making of VRS calls that would not otherwise be made; or (d) the use of VRS by persons who do not need the service in order to communicate in a functionally equivalent manner. Tive does not seek payment from the TRS Fund for any minutes of service resulting from such practices and if made aware of such practices, Tive will report them to the Commission or the TRS Fund Administrator.

D. Compliance with Other Standards – 47 C.F.R. § 64.604(d)

Section 64.604(d) incorporates the applicable requirements of Section 9.14, Emergency Calling Requirements; Section 64.611, Internet-based TRS registration; Section 64.615, TRS User Registration Database and administrator; Section 64.621, Interoperability and portability; Section 64.631, Verification of orders or change of default TRS providers; Section 64.632, Letter of authorization form and content; Section 64.5105, Section 64.5107, Section 64.5108, Section 64.5109, and Section 64.5110 governing TRS customer proprietary network information, of the Commission's rules, as mandatory minimum standards. Tive complies with each of these rules as specifically discussed below.

1. Compliance with Emergency Calling Requirements - 47 C.F.R. § 9.14

Tive provides emergency calling service in full compliance with the Commission's rules. Tive: (1) provides E911 service to its customers; (2) handles and routes emergency calls to the applicable PSAP, designated statewide default answering point, or appropriate local emergency authority that corresponds to the caller's location; (3) immediately attempts to reestablish contact in the event of disconnection with the VRS user and/or the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority and resume handling the call; (4) automatically places 911 calls at the front of call queues; and (5) ensures that information obtained is limited to that needed to facilitate 911 services, is made available only to appropriate persons, and is used only for the purposes of ascertaining a user's location for emergency situations or law enforcement purposes. Tive also delivers the following to the PSAP: Tive's role as VRS provider, the ANI, the caller's Registered Location, and the CA's identification number.

2. Compliance with TRS User Registration Database and Administrator Requirements - 47 C.F.R. § 64.611

a. Default Provider Registration - 47 C.F.R. § 64.611(a)-(c)

Tive provides VRS users with the capability to register with Tive as their default provider. Tive routes and delivers all such users' inbound and outbound calls unless the user chooses to place a call with, or receives a call from, an alternate provider. Tive will update the TRS User Registration Database for users that select Tive as their default provider as required

under the Commission's rules. Tive obtains a written certification from the user attesting that the user is eligible to use VRS for all Registered Users in accordance with the applicable regulations.

b. Ten-Digit Numbering - 47 C.F.R. § 64.611(d)

For each user that registers with Tive as their provider, Tive either (a) facilitates the user's valid porting request from another provider, or (b) assigns the user a geographically appropriate ten-digit number (or, when such numbers are not available in the user's rate center, a geographically approximate ten-digit number). Tive does not assign or issue proxy numbers to VRS users.

c. Toll-Free Numbering - 47 C.F.R. § 64.611(e)

Tive does not provide toll-free numbers.

d. Access Technology - 47 C.F.R. § 64.611(f)

The technology that Tive provides to VRS users delivers routing information only to the user's default provider, except to the extent necessary to complete dial-around calls.

e. User Notification re Ten-Digit Numbering - 47 C.F.R. § 64.611(g)

Tive's website and promotional materials related to numbering or E911 service include an advisory addressing (a) the process for obtaining a ten-digit number, (b) number portability, (c) the process for updating Registered Location information, and (d) the importance of maintaining accurate and updated Registered Location information with a user's default provider.

Tive has also prepared and posted an advisory explaining the process by which user can acquire a toll-free number; transfer control of a toll-free number to the user; and/or request that a toll-free number be linked to the user's ten-digit number in the TRS Numbering Directory. Tive will obtain and keep a record of affirmative acknowledgement by every Registered User of having received and understood the advisory described above.

3. TRS User Registration Database and Administrator - 47 C.F.R. § 64.615

Tive validates the eligibility of a user by querying the TRS User Registration Database on a per-call basis. Validation occurs during the call setup process, prior to the placement of the call. If the eligibility of at least one party is not validated using the TRS User Registration Database, the call is not completed and Tive either terminates the call or offers to register the user if they are able to demonstrate eligibility. Tive does not include in speed of answer calculations and does not seek compensation from the TRS Fund calls that it is prohibited from completing because of the user's eligibility.

Tive will request that the administrator of the TRS User Registration Database remove user information for any registered user that no longer wants its service or for whom the provider obtains information that the user is not eligible to use the service.

4. Compliance With Interoperability and Portability - 47 C.F.R. § 64.621

Tive's users are able to place and receive calls through any of the VRS providers' services, and Tive can receive calls from, and make calls to, any VRS user, to the extent it is technically possible. Tive does not take steps that restrict a user's unfettered access to another provider's service.

Tive's VRS access technologies and video communication service platforms plans to be interoperable with the VRS Access Technology Reference Platform.

5. Verification of Orders for Change of Default TRS Providers - 47 C.F.R. § 64.631

Tive strictly complies with Section 64.631 requirements governing verification of default provider changes. Tive relies on an electronically signed letter of authorization form that complies with Section 64.632, addressed below. Tive retains all documentation for no less than five years, and it does so indefinitely for Registered Users who remain Tive Registered Users.

6. Compliance with Letter of Authorization Form and Content - 47 C.F.R. § 64.632

Tive's registration process is automated online. Letters of authorization are generated upon completion of the registration process and contain the language set forth in Section 64.632(d) of the Commission's rules. Tive maintains standalone electronic copies of the letters of authorization that are available upon Commission request as set forth in Section 64.631.

7. Compliance Customer Proprietary Network Information Regulations - 47 C.F.R. §§ 64.5105, 64.5107, 64.5108, 64.5109, and 64.5110

Tive will comply with Commission Compliance Customer Proprietary Network Information ("CPNI") rules and maintain strict privacy of all user data. All Tive employees receive initial and recurring training regarding CPNI protection and attendant Commission rules, as required per Section 64.5109(b). Tive strictly limits those individuals who may access user data to a need to know basis - Customer Care, CAs, and information technology/operations individuals. As noted, CPNI is transmitted with emergency 911 calls exclusively to PSAPs. Tive provides CPNI to the TRS Fund Administrator for use in the TRS User Registration Database with the affirmative Registered User's approval as set forth in Section 64.611 and otherwise pursuant to Section 64.5107, and when requested by the Fund Administrator for oversight of the Fund pursuant to Section 64.5105(c)(5).

Tive uses CPNI exclusively to support its provision of VRS. Tive does not sell CPNI to others, provide such information to others, or seek to obtain confidential information from competitors.

IV. DEMONSTRATION THAT APPLICANT LEASES FACILITIES AND OPERATES SUCH FACILITIES ASSOCIATED WITH TRS CALL CENTERS (47 C.F.R. § 64.606(a)(2)(ii)(A))

A. Description of the Technology and Equipment Used to Support Call Center Functions - 47 C.F.R. § 64.606(a)(2)(ii)(A)(4)

1. General Description

Tive currently delivers VRS to users using iOS and Android mobile applications (smartphones and tablets). Through Tive's applications, users can use the built-in application features to interact with other clients, device hardware and different cloud services. The figure below describes the high level of the applications' business capabilities and the services that deliver those capabilities.

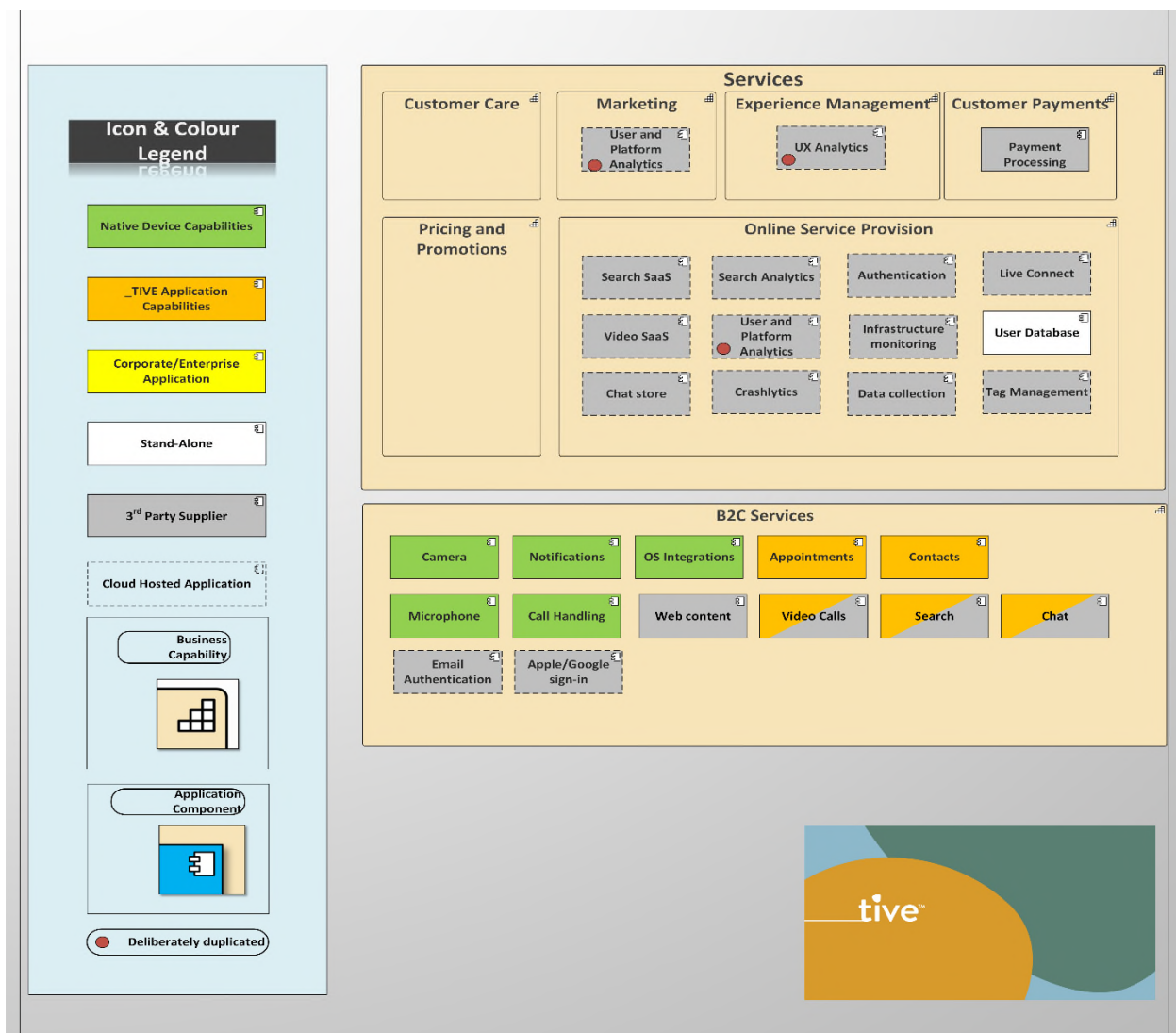


Figure 1: Tive™ - Business Capability to Applications

The Tive application’s functionality is developed to interact with the encrypted enterprise backend-as-a-service (“BaaS”) cloud platform and the secure enterprise cloud platform which provides Tive with real-time computing, storage, message delivery and analytics.

Tive also leverages hardware services provided by the device on which the app is installed, such as access to the camera and microphone, handling incoming call notifications, and integrating with the devices contacts and calendar. [BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]

Tive uploads new TRS self-certifications to the TRS User Registration Database via the Rolka Loube online portal. Tive has two video calling services: Tive™ Connect and Tive™ VRS. Requests to access Tive VRS will be checked against the TRS User Registration Database to ensure that the call is being made by a Registered User. Reports on call activity for the TRS Program will be based on Tive VRS usage.

2. Services

a. Exclusive

These are functions and capabilities that are developed exclusively for use by the Tive application. [BEGIN CONFIDENTIAL]

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[END CONFIDENTIAL]

b. Shared

B2C Services: These functions and capabilities are shared with the Tive application.

o Camera and microphone: Tive requests permission from users and CAs to access the device's camera, microphone (as well as to the local network, notifications, mobile data, and voice assistants such as Siri).

o Notifications: handles notifications received from Firebase cloud messaging

o Call Handling: routes calls to the Tive VRS or invokes Tive VRS for calls placed by the user

o OS Integrations: integration, permissions, voice assistant, app stores

o Authentication: the Tive authentication model supports both native email authentication as well as federated authentication:

The following figure communicates what capabilities are internal versus external to Tive and the information flows and dependencies between them.

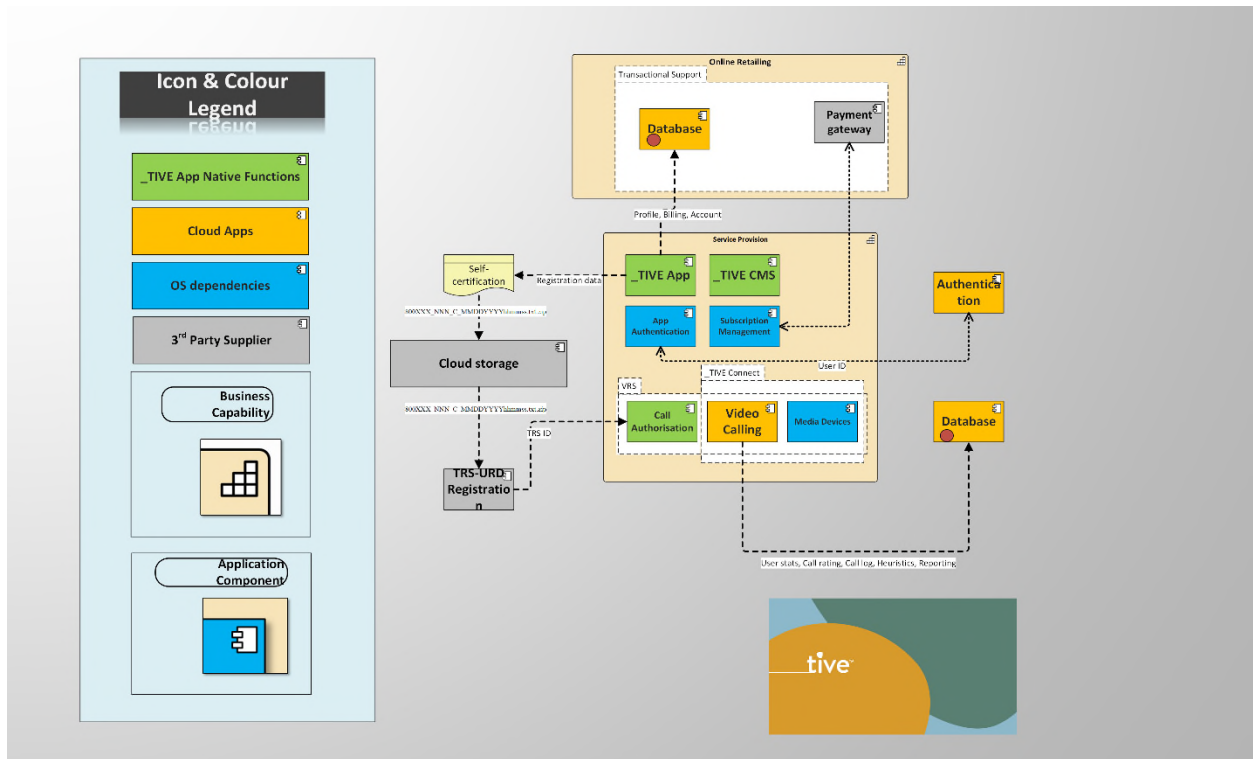


Figure 2: Tive™ - Application Co-operation

The video calling and device services (camera and microphone) support Tive Connect and Tive VRS, but Tive VRS also has a call authorization service that checks the TRS User Registration Database for the status of the TRS ID associated with the caller. Self-certification data provided to Tive by the user (as part of their registration process) is in turn provided to Rolka Loube for registration in the TRS-User Registration Database, and VRS calls cannot be made in the Tive application until this registration is completed.

3. Specific Technology and Equipment for Call Centers

Whether at home or in the call center, VRS call management is handled natively by Tive. The call center will have co-located CAs and call center managers who have access to call monitoring and reporting. Call center managers/customer care staff will also have access to a cloud-based CRM service that will provide customer support functions such as case management. The CRM solution is fully cloud based with access and authentication controlled through the Active Directory (“AD”). There will be some on premise instances of these services, such as Microsoft Exchange in addition to AD, which will be synchronized with the Azure environment.

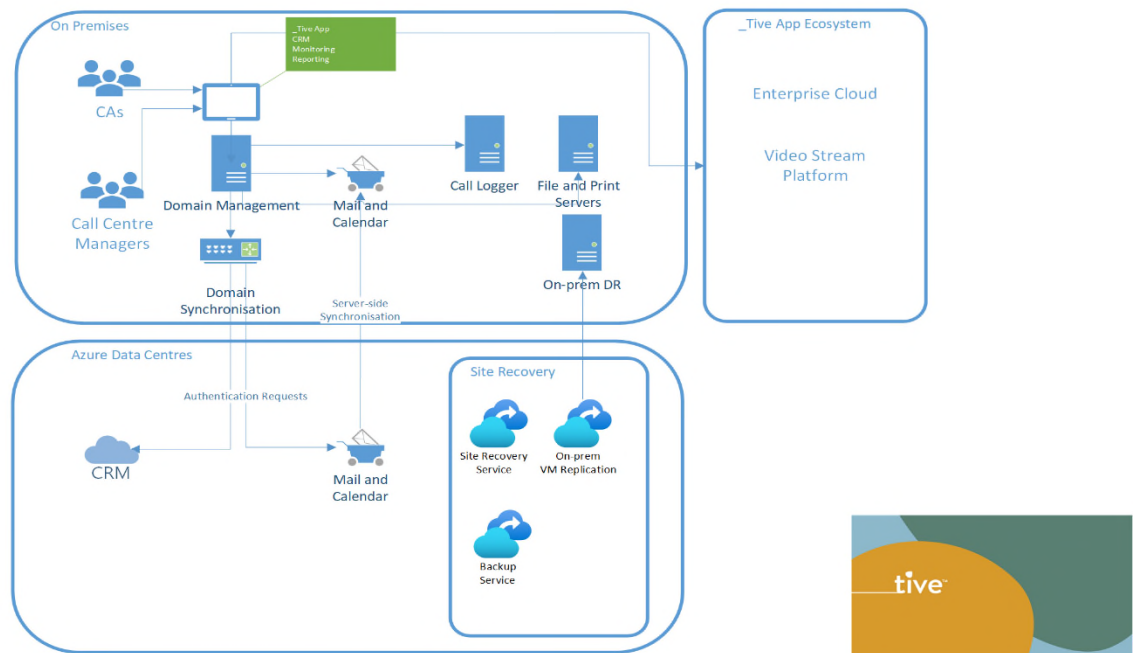


Figure 3: Tive™ - Call Centers Management Suite

In addition to this IT infrastructure, which will support Tive’s call center operations, the following additional IT equipment will be provided at the call centers and is accessible by the at-home CAs.

- **CAs videophones:** CAs use the same application as VRS users, though CAs have additional functionality to manage VRS calls and manage their Tive account and billing. The hardware is provided by the CAs themselves, using the iOS or Android device of their choice that meets the application’s minimum system requirements.
- **CAs headsets:** Tive does not provide CAs with headsets, but we have a policy of encouraging CAs working from home to use the headset compatible with their device to ensure privacy and external noise-cancellation.
- **Call management client:** The call management functions for Tive are bundled with the mobile application. Users that are registered as interpreters have access to these call flow and routing functions.
- **Call management servers:** Call queuing and routing is provided by native application functions (e.g., managing CA availability and online status and booking CA appointments), OS capabilities (e.g., routing inbound calls to the Tive application), and the cloud-based video call platform. The diagram below illustrates the separation of core application functions on the enterprise cloud, whose access and the positive and negative data flows, as well as endpoints through which third party services are accessed, are all brokered by the app engine installed on the user’s and CAs device:

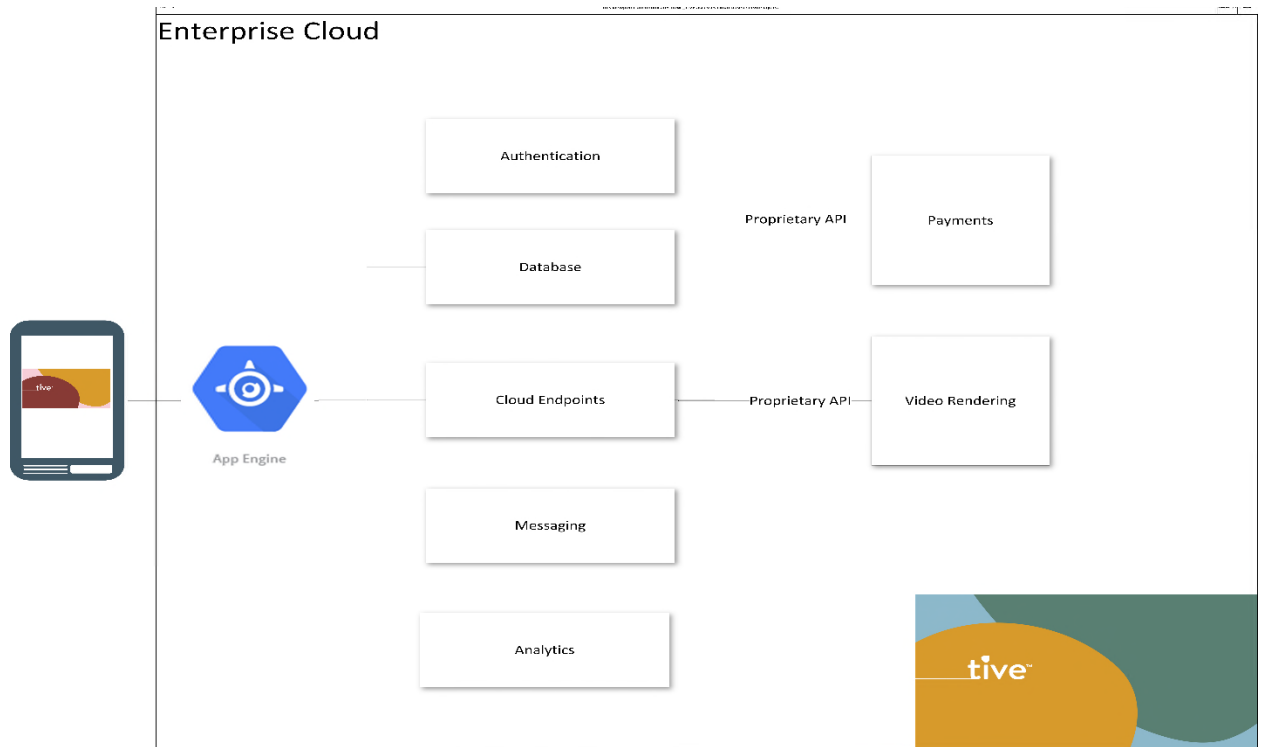


Figure 4: Tive™ - Enterprise Cloud Platform Application Functions

- Billing servers: Tive uses an encrypted BaaS cloud platform for call data storage and analytics.
- Storage area networks: A number of different services provide data storage capabilities to Tive users and CAs. The encrypted BaaS cloud platform stores data relating to text chat, crash data, and user activity in the application. The users' devices store application settings, call history and chat data for offline access.
- Uninterruptible power supply and service availability: Tive is an application that runs on a smartphone or tablet, and so in some sense the availability of the service depends on the individual CAs keeping their device charged. However, the VRS service itself uses the secure enterprise cloud platform's resource locations to ensure high availability and redundancy of native application functions. **[BEGIN CONFIDENTIAL]**

[REDACTED]

[END CONFIDENTIAL]

- Networks, firewalls, load balancing and security: CAs provide their own access to the Internet, but the network resiliency of Tive VRS relies on an encrypted BaaS cloud platform for the following services:
 - Security:
 - Data encryption: To encrypt data in transit using HTTPS and logically isolate customer data, as well as data at rest.

- Personal data: To keep personal data safe, Tive employs extensive security measures to minimize access: Tive restricts access to select employees who have a business purpose to access personal data. Firebase logs employee access to systems that contain personal data. Tive only permits access to personal data by employees who sign in with Tive’s sign-in and two-factor authentication.
- Data protection:
 - Tive supports both the European Union General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA).
 - All database services used by Tive (aside from App Distribution and Crashlytics) have successfully completed the ISO 27001 and SOC 1, SOC 2, and SOC 3 evaluation process, and some have also completed the ISO 27017 and ISO 27018 certification process.
- Video software security and privacy standards are also included in Tive’s services:
 - Tive deploys anti-Distributed Denial of Service (“DDoS”) firewalls in each core cloud data center, and Tive also has the ability to isolate any data center that is the subject of a DDoS attack.

B. Complete Copy of Each Lease or License Agreement for Automatic Call Distribution - 47 C.F.R. § 64.606(a)(2)(ii)(A)(8)

Tive does not have a lease or license for automatic call distribution because it has developed its own software as a service platform.

V. APPLICANT’S ORGANIZATIONAL STRUCTURE AND MANAGEMENT (47 C.F.R. § 64.606(a)(2)(ii)(B))

The following list of individuals hold at least a ten percent equity interest in Tive, have the power to vote ten percent or more of the securities of the Tive, or exercise de jure or de facto control over Tive. [BEGIN CONFIDENTIAL]

■ [REDACTED]
■ [REDACTED]
■ [REDACTED] [END CONFIDENTIAL]

This list also represents the names of Tive’s managing members. A copy of a diagram presenting Tive’s organization structure is attached in Exhibit 1.

VI. APPLICANT’S EMPLOYEES - 47 C.F.R. § 64.606(a)(2)(ii)(C) AND (D)

A list of the number of Tive’s full-time and part-time employees involved in VRS operations, including and divided by the following positions: executives and officers; video

phone installers, communications assistants, and persons involved in marketing and sponsorship activities is included in Exhibit 1.

Tive will retain for at least five years from date of submission of this application, and will make available to the Commission upon request, copies of employment agreements for all of Tive's employees directly involved in VRS operations, executives, and communications assistants, and a list of names of employees directly involved in VRS operations.

VII. SPONSORSHIP ARRANGEMENTS RELATING TO INTERNET-BASED TRS (47 C.F.R. § 64.606(a)(2)(ii)(E))

Tive has included a list of all sponsorship arrangements, including on that list a description of any associated written agreements in Exhibit 2. Tive will retain copies of all such arrangements and agreements for three years from the date of the application and will submit them to the Commission upon request.

VIII. DESCRIPTION OF COMPLAINT PROCEDURES (47 C.F.R. § 64.606(a)(2)(iii))

Consumer complaints and inquiries may be made to Tive through several means. Registered Users may submit a complaint to the interpreter who is interpreting a call. A caller may also submit a complaint via videophone, telephone, or by e-mail. The complaint is then forwarded to Tive Customer Care department for resolution. All complaints are logged and private. The information documented in the complaint log includes the date/time of the call, the interpreter's name and identification number, the caller's name, the videophone number or e-mail address, and an explanation of the complaint, its resolution, and the individual ultimately responsible for the complaint's resolution.

Upon receiving a complaint, Tive's Customer Care team contacts the caller in an attempt to resolve the issue. If the customer is satisfied with Customer Care's response, then the complaint log is documented that the problem has been resolved. If the customer is not satisfied, then the complaint is escalated to the Workforce Manager, then to the Director of Operations, and then ultimately to Tive's managing partner until the complaint is resolved. If a complaint pertains to an interpreter, then the Customer Care supervisor reviews and determines if corrective action or disciplinary measures involving the interpreter are appropriate. As part of the response, complainants are also informed that they may contact a designated higher level company official or the Commission if dissatisfied with a response.

Complaint documentation is consolidated into a complaint log, which is reviewed monthly by the Director of Operations Chief Operations Officer to ensure timely resolution of complaints. The complaint log will be submitted annually to the Commission pursuant to 47 C.F.R. § 64.604(c)(1). Many technical questions that might otherwise result in a consumer complaint can be resolved by the provision of timely information. Tive provides a variety of on-line support resources, including a comprehensive "frequently asked questions" page, to provide consumers with immediate guidance on many questions or problems.

IX. STATEMENT REGARDING SUBMISSION OF ANNUAL COMPLIANCE REPORTS (47 C.F.R. §§ 64.606(a)(2)(iv) AND 64.606(g)(5)(i)-(iv))

Tive will file annual compliance reports with the Commission demonstrating continued compliance with applicable Commission rules governing Tive's provision of Fund-eligible VRS, certified as accurate and complete by a Tive officer pursuant to 47 C.F.R. §64.606(a)(2)(v) and 47 C.F.R. §64.606(g)(5)(i)-(iv).

X. WAIVERS REQUESTED

Tive requests waiver of certain FCC rule requirements that do not align fully with next-generation, VRS technology capabilities. Under Section 1.3 of the Commission's rules, the Commission has authority to waive its rules "for good cause shown." Good cause exists if "special circumstances warrant a deviation from the general rule and such deviation will serve the public interest" better than adherence to the general rule.¹¹ In determining whether the waiver is appropriate, the Commission should "take into account considerations of hardship, equity, or more effective implementation of overall policy."¹² Tive submits that good cause exists to waive the following rules.

A. Leases or Licenses for Call Centers - 47 C.F.R. § 64.606(a)(2)(ii)(A)

Tive requests waiver of Section 64.606(a)(2)(ii)(A) of the FCC's rules, which requires, in part, documentary and other evidence demonstrating that the applicant leases, licenses or has acquired its own facilities for VRS call centers. Tive™ was both conceived and finalized during the COVID-19 pandemic. Due to the stay-at-home orders as well as observance of safety guidelines, Tive was in an unprecedented situation of not knowing when it would be able to staff any call center for which it obtained a lease. Upon certification, Tive fully intends to finalize and execute leases for call centers in King County, Washington and San Bernardino County, California and submit lease agreements to the Commission, satisfying and fully in compliance with Section 64.606(a)(2)(ii)(A)(1). Moreover, as a result of the restrictions associated with the COVID-19 pandemic, Tive was conceived and developed with the intention that it could be utilized to provide VRS and comply with all applicable FCC rules and regulations whether a CA is located at home or at a call center. Thus, Tive is already prepared to provide VRS from CAs working at home as Section III.B.4 demonstrates.

For the same reasons set forth above, Tive also requests a waiver of Section 64.606(a)(2)(ii)(A)(5), which requires a copy of each proof of purchase, lease or license agreement for all technology and equipment used to support call center functions for each call center operated by the applicant within the United States.

B. VRS Service Name and URL Routing - 47 C.F.R. § 64.604(c)(5)(iii)(N)(1)(ii)

Tive requests waiver of Section 64.606(c)(5)(iii)(N)(1)(ii) of the FCC's rules, which requires, in part, providers of VRS to route all VRS calls through a single URL address. Tive

¹¹ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

¹² *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

utilizes advanced software technology that does not utilize a URL address to route VRS calls which is elaborated upon in Section IV. Despite utilizing differing technology, Tive ensures that all VRS calls are placed in a manner that clearly identifies Tive as the provider of VRS.

For the same reason set forth above, Tive also requests a waiver of Section 64.604(c)(5)(iii)(D)(2)(x), which requires the URL address through which the call is initiated.

XI. CERTIFICATION

I swear under penalty of perjury that I am Leif Martinoff, CEO, an officer of the above-named applicant, that I have examined the foregoing submissions, and that all information required under the Commission's rules and orders has been provided and all statements of fact, as well as all documentation contained in this submission, are true, accurate, and complete.



Leif Martinoff
CEO
Tive, LLC
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Los Angeles, California 90004

XII. CONCLUSION

As demonstrated above, Tive meets the requirements to receive reimbursement from the TRS Fund for provision of VRS. Tive respectfully requests the Commission's expeditious grant of such certification.

Respectfully submitted,



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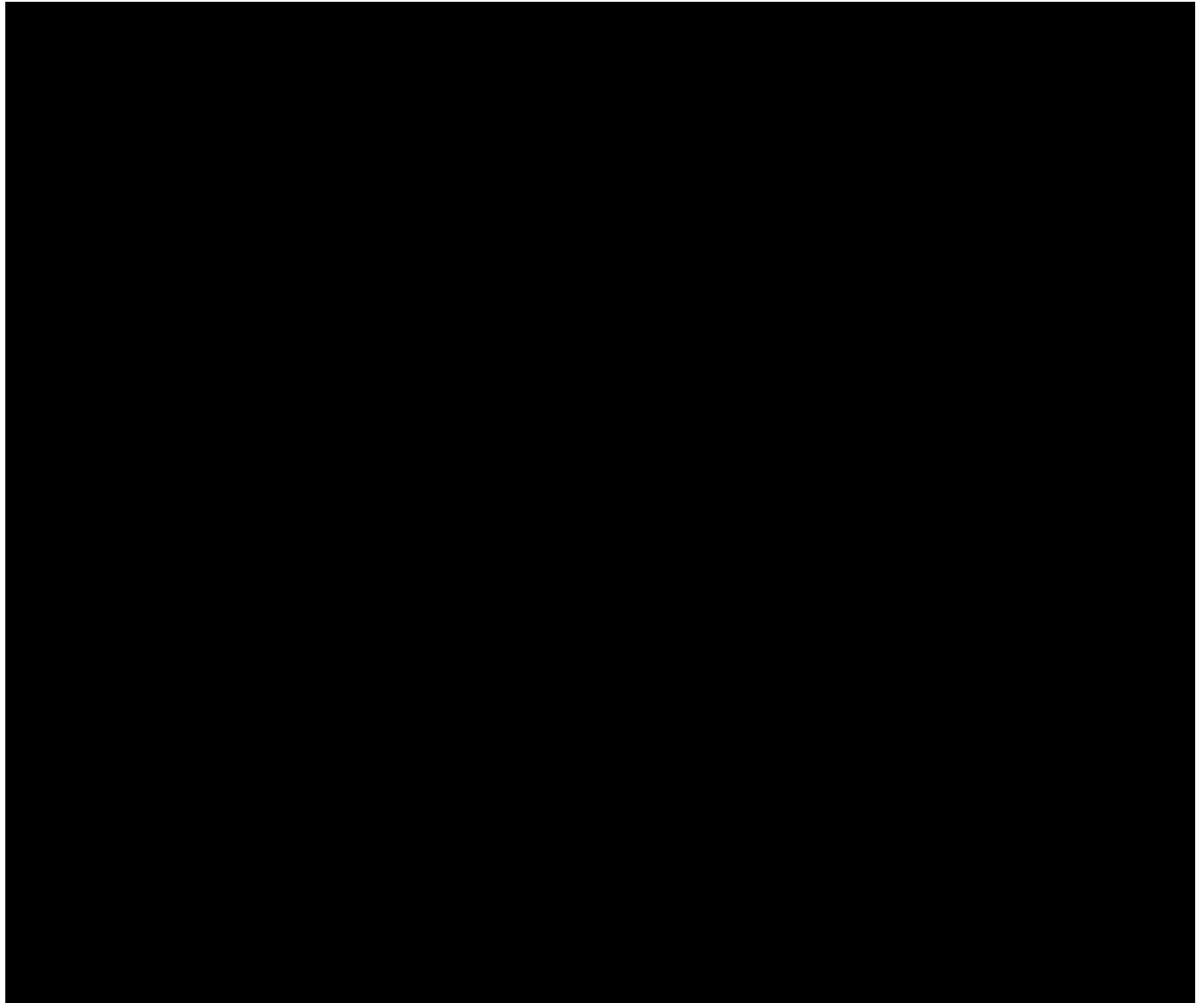
Counsel to Tive, LLC

July 15, 2021

EXHIBIT 1

**STRUCTURE OF ORGANIZATIONS LISTING OF FULL-TIME AND PART-TIME
EMPLOYEES INVOLVED IN VRS OPERATIONS BY CATEGORY**

[BEGIN CONFIDENTIAL]



[END CONFIDENTIAL]

EXHIBIT 2

SPONSORSHIP AGREEMENTS

[BEGIN CONFIDENTIAL]

[REDACTED]

[REDACTED]

[REDACTED]

[END CONFIDENTIAL]